

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO

---

**IN RE: DAVOL, INC./C.R. BARD, INC.,  
POLYPROPYLENE HERNIA MESH  
PRODUCTS LIABILITY LITIGATION**

**Case No. 2:18-md-2846**

**CHIEF JUDGE EDMUND A. SARGUS, JR.  
Magistrate Judge Kimberly A. Jolson**

---

**This document relates to:  
SHANA RUDER**

**Case No.: 2:20-cv-01406**

---

**DAVOL INC.'S AND C. R. BARD, INC.'S SHORT FORM ADOPTION BY REFERENCE  
ANSWER TO PLAINTIFFS' SHORT FORM ADOPTION BY REFERENCE  
COMPLAINT**

Pursuant to Case Management Order No. 9, Defendants Davol Inc. and C. R. Bard, Inc. (“Defendants”), by and through their undersigned counsel, hereby submit their Short Form Adoption by Reference Answer.

Defendants hereby incorporate by reference and adopt, as though restated in full, the Master Answer dated January 2, 2019, including each and every Affirmative Defense, and deny all causes of action in the Master Complaint and Short-Form Adoption by Reference Complaint unless expressly admitted.

This Short-Form Adoption by Reference Answer is not intended to and shall not waive any applicable defenses available to Defendants at this time, and Defendants hereby reserve the right to respond to Plaintiffs individual complaint by way of any motions permissible under the Federal Rules of Civil Procedure or as set forth in CMO No. 9, at section VII.

Defendants demand a Jury Trial on all Counts.

Dated: July 6, 2020

Respectfully submitted,

/s/William D. Kloss, Jr.

William D. Kloss, Jr.

Arryn K. Miner

Henrique A. Geigel

**Vorys Sater Seymour and Pease**

52 East Gay Street

Columbus, OH 43215

(614) 464-6360

wdklossjr@vorys.com

akminer@vorys.com

hageigel@vorys.com

Michael K. Brown

**REED SMITH LLP**

355 South Grand Avenue

Suite 2900

Los Angeles, CA 90071-1514

(213) 457-8000

mkbrown@reedsmit.com

Eric L. Alexander

**REED SMITH, LLP**

1301 K Street, NW

Suite 1000 – East Tower

Washington, DC 20005

(202) 414-9200

ealexander@reedsmit.com

*Counsel for Defendants Davol Inc. and  
C. R. Bard, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 6, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of this electronic filing to all counsel of record.

/s/William D. Kloss, Jr.

William D. Kloss, Jr.

*Counsel for Defendants Davol Inc. and  
C. R. Bard, Inc.*